

From: Richard Jaretsky
Sent: Wednesday, December 15, 2004 3:49 PM
To: NIEHS ICCVAM
Subject: Comment On ICCVAM

Dear Dr. Stokes,

I think that the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM), which is supposed to promote the acceptance of alternatives to cruel and outdated animal tests, are doing the opposite. While many European countries have accepted alternatives to the notorious Draize rabbit eye irritation test, ICCVAM takes the position that a "confirmatory" test should be done on animals.

ICCVAM should accept the non animal test results and eliminate proposals for "confirmatory" testing on animals. I also urge the following.

ICCVAM's background review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility and its over and under prediction rate. ICCVAM should not presume to "validate" a non animal method against an animal test that has never been properly validated itself.

ICCVAM should take the time to learn that these tests are being used safely and effectively by the industry today.

ICCVAM should stop dragging its heels and setting up obstacles to the acceptance and use of non animal test methods in the United States.